

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

FL RECEIVABLE TRUST 2002-A  
Plaintiff,

vs.

BAGGA ENTERPRISES, INC., JAMUNA REAL  
ESTATE, LLC., UNITED MANAGEMENT  
SERVICES, INC., and WELCOME GROUP, INC.,  
Defendants.

Civil Action

Nos. 02-CV-2710  
02-CV-2711  
02-CV-2780  
02-CV-2786

**ORDER**

AND NOW this \_\_\_\_\_ day of \_\_\_\_\_, 2003, upon  
consideration of Non-Party Witness Khushvinder K. Bagga's Motion for Emergency Hearing  
and/or Expedited Consideration of Non-party Kusvinder K. Bagga's Motion for Protective Order  
and any opposition thereto, it is ORDERED that the Motion is **GRANTED** and that the  
deposition is stayed pending further order of this Court.

By the Court:

\_\_\_\_\_  
LOWELL A. REED U.S.D.J.

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

FL RECEIVABLE TRUST 2002-A  
Plaintiff,

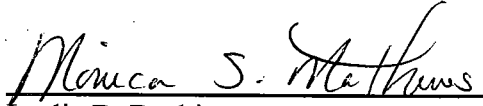
vs.

BAGGA ENTERPRISES, INC., JAMUNA REAL  
ESTATE, LLC., UNITED MANAGEMENT  
SERVICES, INC., and WELCOME GROUP, INC.,  
Defendants.

Civil Action Nos.  
02-CV-2710  
02-CV-2711  
02-CV-2780  
02-CV-2786

**MOTION FOR EMERGENCY HEARING AND/OR EXPEDITED CONSIDERATION  
OF NON-PARTY KUSVINDAR K. BAGGA'S MOTION FOR PROTECTIVE ORDER**

Non-party Kushvndar K. Bagga ("Mrs. Bagga") hereby moves this Court for an Emergency Hearing and/or expedited consideration of her Motion for Protective Order pursuant to Fed. R. Civ. P. 69 and Pa. R. Civ. P. 4011 and 4012 limiting the scope of the deposition to be taken in aid of execution. Presently, the deposition is scheduled to take place on May 15, 2003. Alternatively Non-Party Bagga requests that the Court stay the deposition until the Motion for Protective Order can be fully briefed, argued and resolved.

  
Leslie B. Baskin  
Suzanne Ilene Schiller  
Monica S. Mathews  
SPECTOR GADON & ROSEN, P.C.  
1635 Market Street, 7<sup>th</sup> Floor  
Philadelphia, PA 19103  
(215) 241-8888  
(215) 241-8844 (facsimile)

Dated: May 7, 2003

Attorneys for Non-Party Witness  
Khushvinder K. Bagga

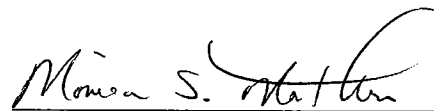
**Certificate of Service**

I, Monica S. Mathews, hereby certify that a true and correct copy of the foregoing motion for emergency hearing and/or expedited consideration was served by hand delivery on May 7, 2003 upon the following:

Jonathan W. Hugg, Esquire  
Obermayer Rebmann Maxwell & Hippel, LLP  
One Penn Center – 19th Floor  
1617 JFK Blvd.  
Philadelphia, PA 19103-1895

Victor Lipsky, Esquire  
Lipsky & Brandt  
1101 Market St., Suite 2820  
Philadelphia, PA 19103

Steven D. Usdin, Esquire  
Adelman Lavine Gold & Levin, PC  
Two Penn Center Plaza, Suite 1900  
Philadelphia, PA 19102-1799

  
\_\_\_\_\_  
Monica S. Mathews